

STATE OF TENNESSEE

Office of the Attorney General



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425 FIFTH AVENUE NORTH
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September 4, 2001

VIA: HAND-DELIVERY

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

Re: Petition to Intervene
Chattanooga Gas Company
Docket No. 01-00619

Dear Mr. Waddell:

Enclosed you will find the original and the appropriate number of copies for the Attorney General's Petition of Chattanooga Gas Company for Approval of Tariff Establishing a Performance-Based Rate Making Mechanism.

Sincerely,

A handwritten signature in cursive script that reads "Chris Allen".

CHRIS ALLEN
Assistant Attorney General
(615) 532-2590

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: PETITION OF)
CHATTANOOGA GAS COMPANY)
FOR APPROVAL OF A TARIFF)
ESTABLISHING A PERFORMANCE -)
BASED RATE MAKING MECHANISM)

DOCKET NO. 01-00619

ATTORNEY GENERAL'S
PETITION TO INTERVENE

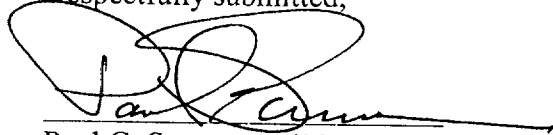
Comes Paul G. Summers, the Attorney General & Reporter, through the Consumer Advocate and Protection Division, (hereinafter "Attorney General") pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this case in the public interest on behalf of consumers of Tennessee who will be affected by the proposal of a Performance-Based Rate Making Mechanism ("PBR") by Chattanooga Gas Company ("CGC"). For cause the Petitioner would show as follows:

1. The Attorney General is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case, and participate or intervene in proceedings to represent the public interest of Tennessee consumers in accordance with the Uniform Administrative Procedures Act (UAPA).
2. In the present docket, CGC seeks approval by the Tennessee Regulatory Authority ("TRA") of a PBR and in conjunction the ability to forego the annual prudence audit of

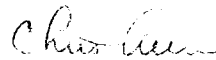
its gas purchasing practices.

3. CGC has undergone a prudence audit which, on information and belief, dates back to 1992. While there have been no known adjustments to come out of this audit that is not to say that the existence of the prudence audit has not had a favorable influence on the gas purchasing practices of CGC.
4. The Attorney General believes that CGC should continue the past practice of the prudence audit.
5. Accordingly, the Attorney General requests to intervene in this case involving the approval of the PBR presently before the TRA.

Respectfully submitted,



Paul G. Summers, 6285
Attorney General and Reporter

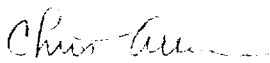


Chris Allen, 13696
Assistant Attorney General
Consumer Advocate and Protection Division
John Sevier Building, 3rd Floor
425 5th Avenue North
Nashville, Tennessee 37243-0500
(615)-532-2590

Certificate of Service

I hereby certify that a true and correct copy of the Petition to Intervene was served on parties below via U.S. Mail, postage prepaid, this September 4, 2001.

D. Billye Sanders, Esquire
Waller, Lansden, Dortch & Davis
511 Union Street, Suite 2100
P.O. Box 198966
Nashville, Tennessee 37219-8966



Chris Allen
Assistant Attorney General

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